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Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBERT JACKSON,

Plaintiff,

- against -

AMERICAN CIVIL LIBERTIES UNION, INC.
and LUCIA TIAN, in her individual and
professional capacity,

Defendants.

Case No. 21 Civ. 05037 (JPO)

DEFENDANTS' NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that Defendants the American Civil Liberties Union, Inc. ("ACLU") and Lucia Tian (collectively, "Defendants") by their attorneys, Kauff McGuire & Margolis LLP, upon (i) the annexed Declaration of Michelle A. Coyne, Esq. (with exhibits); (ii) the annexed Memorandum of Law in Support of Defendants' Motion for Summary Judgment, and (iii) Defendants' Statement of Material Facts Pursuant to Local Civil Rule 56.1, served and filed on or about May 10, 2024, will move this Court before the Honorable J. Paul Oetken, United States District Court, 40 Foley Square New York, NY 10007, on July 25, 2024, for an Order granting summary judgment in favor of Defendants and dismissing the Complaint against Defendants in its entirety, on the grounds that there are no genuine issues of material fact and Defendants are entitled

to judgment as a matter of law.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Court's November 17, 2023 Order and April 17, 2024 minute entry, answering papers, if any, are to be served and filed by June 24, 2024, and reply papers are to be served and filed by July 15, 2024.

Dated: New York, New York
May 10, 2024

Respectfully submitted,

KAUFF McGUIRE & MARGOLIS LLP

/s/Michele A. Coyne

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